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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TARLOK SINGH KHAKH,)	
)	CASE NO. 2:22-cv-00519-CDS-EJY
Plaintiff,)	
)	STIPULATION AND ORDER TO
vs.)	EXTEND SCHEDULING ORDER
)	DEADLINES
BHAJAN SIDHU dba SMOKE 4 U,)	
)	(Second Request)
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between the parties' counsel of record, that discovery deadlines in the Order Granting the Stipulation and Order to Extend Scheduling Order Deadlines (First Request) [ECF No. 13] be extended an additional ninety days (90) days to allow the parties to complete written discovery and take depositions.

Description of Discovery Deadline	Current Discovery Deadline	Proposed New Discovery Deadline
Discovery Cut Off	March 27, 2023	June 26, 2023 ¹
Dispositive Motion(s)	April 26, 2023	July 26, 2023
Joint Pretrial Order ²	May 26, 2023	August 25, 2023

¹ The ninetieth day (June 25, 2023) is a Sunday.

² If dispositive motions are filed, the Joint Pretrial Order will be due thirty (30) days after the Court enters its decision on any dispositive motion(s).

1 The parties provide the following information to the Court regarding the proposed
2 extension of the discovery deadline. The reason for the parties' inability to comply with this
3 deadline is because Defendant decided to find new counsel and that put a hold on everything.

4 **Discovery Completed To Date**

5 The parties have exchanged their initial disclosures. The parties intend to propound
6 written discovery and take depositions.

7 **Remaining Discovery To Be Completed**

8 Both parties intend to propound interrogatories, production request and possibly requests
9 for admissions. Defendant intends to conduct the deposition(s) of Plaintiff; Plaintiff intends to
10 conduct the depositions of Rule 30(b)(6) designees; depositions may also be conducted of any
11 current or former employees; and the parties may also conduct additional related written
12 discovery.

13 **Reasons Discovery Could Not Be Completed Within The Existing Deadline**

14 The reason for the parties' could not complete discovery within the existing deadline is
15 because Defendant decided to find new counsel and that put a hold on everything.

16 This is the parties' second request for an extension of the discovery deadline date and is
17 not made to delay this matter. Based upon the foregoing, the parties believe there is good cause
18 for the requested extension.
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This request is being submitted at least 21 days before each deadline sought to be extended and any further requests will be made at least 21 days before the deadline(s) sought to be extended.

Dated this 28th day of February, 2023.

LAW OFFICES OF MICHAEL P.
BALABAN

LAW OFFICES OF MALIK W. AHMAD,
ESQ.

/s/ Michael P. Balaban, Esq.

/s/ Malik W. Ahmad, Esq.

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ORDER

IT IS HEREBY ORDERED that the Second Stipulation for Extension of Time (ECF No. 16) is GRANTED; provided, however, that no further extension of discovery deadlines will be granted absent a demonstration that significant discovery has taken place prior to such a request to extend.


UNITED STATES MAGISTRATE JUDGE

DATED: February 28, 2023